

February 6, 2006

VIA ELECTRONIC DELIVERY

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: EB Docket No. 06-36
EB-06-TC-060
Certification of CPNI Filing February 6, 2006**

Dear Secretary Dortch,

Pursuant to the Commission's Public Notice released on January 30, 2006, attached is the annual certification of Pac-West Telecomm, Inc. in compliance with section 64.2009(e) of the Commission's rules, 47 C.F.R. §64.2009(e).

If you have any questions, please do not hesitate to contact the undersigned.

Sincerely,




Lynne Martinez
Director Government Affairs

Cc: Kathleen Ramsey, Sonnenschein Nath & Rosenthal LLP
Byron McCoy, Telecommunications Consumers Division, Enforcement Bureau, FCC
Best Copy and Printing, Inc. (BCPI)

**PAC-WEST TELECOMM, INC.
ANNUAL SECTION 64.2009(e) CERTIFICATION**

I, John F. Sumpter, a duly authorized officer of Pac-West Telecomm, Inc. ("Pac-West"), hereby certify on behalf of Pac-West, that I have personal knowledge that Pac-West has operating procedures as described in the attached statement that to the best of my knowledge, information and belief are adequate to ensure compliance with the rules of the Federal Communications Commission, codified at 47 C.F.R. Subpart U, implementing Section 222 of the Communications Act of 1934, as amended.



John F. Sumpter
Vice President Regulatory
Pac-West Telecomm, Inc.
February 6, 2006

**STATEMENT REGARDING OPERATING PROCEDURES
IMPLEMENTING 47 C.F.R. SUBPART U
GOVERNING USE OF
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI)**

The following statement explains the internal procedures of Pac-West Telecomm, Inc. ("Pac-West") to ensure that it is in compliance with the Commission's CPNI rules.

Pac-West uses CPNI internally for the purpose of providing a customer with the requested service and marketing product enhancements and new service offerings among the categories of service to which the customer already subscribes from Pac-West.

Pac-West may also use CPNI internally for the following actions:

- (1) to bill and collect for services rendered;
- (2) to provision inside wiring installation, maintenance, and repair services;
- (3) to market services formerly known as adjunct-to-basic services, such as, but not limited to, speed dialing, computer-provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller I.D., call forwarding, and certain Centrex features; and
- (4) to protect the rights or property of Pac-West, or to protect its users and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, Pac-West's services.

Pac-West procedures require that CPNI be used only for the purposes identified above. Customer approval is not required for these uses of CPNI as they are specifically permitted under the statute or by Commission rule.

Pac-West takes the security of customer CPNI seriously. All marketing campaigns, as referenced above, are limited to product enhancements and new service offerings among the categories of service to which the customer already subscribes to ensure the appropriate treatment of CPNI and related confidential information. Pac-West's Network Integrity department is trained to handle all CPNI and related confidential information requests. All employees receive educational information on CPNI and related confidential information. Pac-West does not sell, disclose or otherwise distribute CPNI to third parties outside of its own marketing activities.